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July 21, 2011

**Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20554

**Re: Ex Parte Statement  
CG Docket No. 09-158, Consumer Information and Disclosure  
CC Docket No. 98-170, Truth-in-Billing and Billing Format  
WC Docket No. 04-36, IP-Enabled Services**

Dear Ms. Dortch:

AT&T appreciates the opportunity to provide input on a potential consumer guide for Internet services that FCC staff discussed with various ISPs on July 14, 2011. As the FCC evaluates the content of the educational material it intends to provide to consumers, AT&T offers the following three suggestions.

First, AT&T would encourage the FCC to notify consumers that its proposed performance recommendations are general estimates, not specific performance requirements for individual applications. Only the provider of a given application will know for certain the particular requirements needed for that application to produce a satisfactory consumer experience. Thus, consumers should be encouraged to consult the performance requirements published by application providers in order to better understand the performance needs of those applications.

Second, AT&T would encourage the FCC not to include performance requirements related to latency in its inaugural consumer education effort. As the FCC is aware, determining the latency attributable to a specific ISP's network is a complex undertaking. Further, in our experience, providers of many popular consumer Internet applications do not specify any recommended latency requirements for their customers. Thus, as discussed on July 14, latency would likely not provide particularly useful information to typical consumers and, in fact, may confuse or intimidate such consumers.

Finally, there are differences of opinion within the industry regarding how much bandwidth is really necessary to support the performance needs of a particular class of applications, even at the general level. This is primarily the result of individual application providers making bandwidth-latency decisions based on the knowledge of their target customer base, the needs of their applications, and the variety of end-to-end paths that must be supported. As a result, AT&T would encourage the FCC to identify

the sources from which it derived its bandwidth estimates, so that both ISPs and consumers can better understand the basis for those estimates.

If you have any questions, please do not hesitate to contact me at (202) 457-3010.

Sincerely,

A handwritten signature in blue ink, appearing to read "James K. Smith".

James K. Smith

cc: Ellen Satterwhite  
Deborah Broderon